

**UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

DONALD J. TRUMP, the Forty-Fifth
President of the United States;
LINDA CUADROS; AMERICAN
CONSERVATIVE UNION;
RAFAEL BARBOSA; DOMINICK
LATELLA; WAYNE ALAN ROOT;
NAOMI WOLF,

Plaintiffs - Appellants,

v.

TWITTER, INC.; JACK DORSEY,

Defendants - Appellees.

and

UNITED STATES OF AMERICA,

Intervenor - Appellee,

No. 22-15961

D.C. No. 3:21-cv-08389-JD

United States District Court for the
Northern District of California

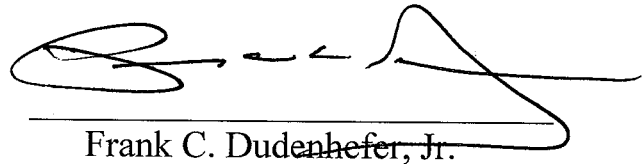
**Declaration of Frank C.
Dudenhefer, Jr.**

I, Frank C. Dudenhefer, Jr., declare as follows:

1. I am an attorney duly licensed to practice before the Supreme Court of the State of Louisiana and was admitted *pro hac vice* in the preceding below from which this appeal was taken. I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called to do so.

2. Dr. Wolf advised Plaintiffs' Lead Counsel via email on August 24, 2022 that she wished to change her legal strategy and representation in this matter and therefore wished to withdraw from this action as Counsel's (John P. Coale, John Q. Kelly, Michael J. Jones, Ryan Tougias, Frank C. Dudenhefer, Alex Kozinski, Marie L. Fiala, Andrei Popovici, and Richard Polk Lawson) client, and that she would be represented instead by Scott Street.
3. On August 28, 2022, Dr. Wolf again wrote Plaintiffs' Lead counsel, confirming that she consented to Counsel's withdrawing from representing her in all matters. On August 28, 2022, Dr. Wolf, through her newly retained counsel, John W. Howard, Esq., Michelle D. Volk, Esq., and Scott J. Street, Esq., filed a series of pleadings in the United States District Court, Northern District of California below No. 3:21-cv-08378-JD;
4. On August 31, 2022, Counsel advised Mr. Street that, in light of Dr. Wolf's email instructions to Counsel as described above, Counsel would file a motion to withdraw from representing Dr. Wolf in this matter. Counsel further urged Mr. Street to file a substitution as counsel in this matter.
5. Counsel sent substantially the same email to Mr. Street on Friday, September 2, 2022.

Under penalty of perjury, under the laws of the United States of America, I
declare that the foregoing is true and correct. Executed this 7th day of September,
2022 at New Orleans, Louisiana.



Frank C. Dudenhefer, Jr.